

**REMARKS**

Claims 1, 2, 4-9 and 13-17 have been examined, and have been rejected under 35 U.S.C. § 103(a).

**I. Rejection under 35 U.S.C. § 103(a) over U.S. Patent No. 5,224,205 to Dinkin et al. (“Dinkin”) over U.S. Patent No. 4,827,411 to Arrowood et al. (“Arrowood”).**

Claims 1, 2, 5-9 and 15-17 have been rejected under 37 C.F.R. § 103(a) as unpatentable over Dinkin in view of Arrowood.

On pg. 3 of the Office Action, it appears that the Examiner maintains that the claimed host is disclosed by a “network interface means” and the claimed first domain is disclosed by an “interface node” of Dinkin. However, since Dinkin fails to disclose a “network interface means”, and a single interface node does not appear to properly disclose a “domain”, the undersigned contacted the Examiner for clarification on April 28, 2004. The Examiner apologized for the confusion, and indicated that he alleges that the claimed host is disclosed by the interface node IN 126, where the interface node acts as a network node, and further, the claimed first domain is disclosed by the PPN Network 102. Applicant submits that such interpretations are similar to the previous Office Action of October 27, 2003.

**A. Claim 1**

Applicant submits that claim 1 is patentable over the cited references. For example, claim 1 recites that a host of a first domain sends a broadcast packet, for requesting a response

from a node which provides a specific service, to at least any one of a plurality of domains, other than the first domain. Routing information of the at least one domain, (i.e. other than the first domain), is listed in a packet of routing information acquired by the host.

As stated above, the Examiner maintains that the Interface Node IN 126 discloses the claimed host and the PPN Network 102 discloses the claimed first domain. Accordingly, Applicant assumes that the Examiner maintains that the Sub-Area Section 104 discloses one of the other claimed plurality of domains (Fig. 1).

In the January 27, 2004 Amendment, Applicant submitted that Dinkin discloses that a broadcast search request is first sent to the PPN Network 102 (i.e. alleged first domain) (col. 6, line 54-col. 8, line 34). Further, while a broadcast search is performed in PPN Network 102, the Interface Node also performs a search within its own resources (col. 7, lines 28-30). If the results of all searches in the PPN Network 102 and the Interface Node are negative, the control point 206 (CP 206) of the Interface Node 126 performs an extended search of the Sub Area Section 104 (Figs. 1 and 2; col. 8, lines 33-39).

However, Dinkin fails to disclose that any sort of "routing" information is listed in a packet that is received by the host (i.e. IN 126), and that the host sends a broadcast packet to the other domain (i.e. Sub-Area Section 104) listed in the routing information. For example, as stated above, Dinkin discloses that when a broadcast of the PPN Network 102 returns all negative responses, the CP 206 of IN 126 initiates an extended search of the Sub-Area Section 104 (col. 8, lines 33-37). It appears that any information regarding the Sub-Area Section 104 is predetermined or preset in the CP 206. Therefore, it likewise appears that Dinkin fails to

disclose that routing information of the Sub-Area Section 104 is listed on a packet of routing information that was previously received by the IN 126 (i.e. prior to the IN 126 sending a broadcast packet to the PPN Network 102 as disclosed above). In other words, there is no disclosure that the extended search information in the CP 206 is based on any information previously received by the alleged host of the first domain, i.e., the Interface Node 126.

In the current Office Action, the Examiner acknowledges that Dinkin does not expressly disclose that the host of a first domain acquires a packet which includes routing information of a network (pg. 3 of current Office Action). Nevertheless, the Examiner maintains that Dinkin discloses that the Interface Node IN 126 uses routing information to perform a search in col. 7, lines 4-12. However, the cited portion of Dinkin merely discloses that the PPN section 202 of the Interface Node 120 (i.e. the IN 126 of Fig. 1), maintains a directory of all network nodes in the PPN network 102, and consults the directory when a broadcast search is received. Applicant submits that the consultation of a directory fails to disclose the receipt of a routing information “packet.” Further, as set forth above, the directory merely lists network nodes of the PPN network 102 (i.e. the alleged first domain). There is no disclosure of information regarding the domains other than the alleged first domain, i.e. the Sub-Area Section 104.

The Examiner further cites to col. 4, lines 51-57, where Dinkin refers to the Arrowood reference in regard to topology and resources of the PPN Network, i.e. PPN Network 102, the alleged first domain. Similar to Dinkin, Arrowood discloses that the network nodes can maintain their own topology database (col. 3, lines 47-48). As stated above, Dinkin utilizes the teachings of Arrowood in regard to the PPN Network 102. However, Dinkin fails to disclose that routing

information of domains other than the alleged first domain, i.e. the Sub-Area Section 104, are acquired by the Interface Node IN 126. Therefore, Applicant submits that Arrowood fails to cure the deficient teachings of Dinkin.

Further, since Dinkin specifically refers to the teachings of Arrowood in regard to the PPN Network 102, but not in regard to the Sub-Area Section 104 (i.e. alleged domain other than the first domain), it appears that Dinkin teaches away from the use of the Arrowood disclosure in regard to the routing information of the Sub-Area Section 104. Therefore, even if Applicant assumes *arguendo* that the database method of Arrowood discloses the claimed “packets” of routing information, the reference still fails to cure the deficient teachings of Dinkin.

In regard to the Examiner’s statements of Official Notice, Applicant respectfully traverses the statements, and request that the Examiner provide documentary evidence of such information in the next Office Action if the rejection is to be maintained (MPEP § 2144.03).

Based on the foregoing, Applicant submits that claim 1 is patentable over the cited references.

## **B. Claim 2**

Since claim 2 recites features that are analogous to the features recited in claim 1, Applicant submits that claim 2 is patentable over the cited reference for at least analogous reasons as set forth above.

**C. Claims 5, 6, 7 and 8**

Since claims 5, 6, 7 and 8 contain features which are analogous to the features recited in claim 1, Applicant submits that such claims are patentable over the cited references for at least analogous reasons as presented above.

**D. Claim 9**

Since claim 9 is dependent upon claim 8, Applicant submits that such claim is patentable at least by virtue of its dependency.

**E. Claim 15**

Since claim 15 is dependent upon claim 1, Applicant submits that such claim is patentable at least by virtue of its dependency.

**F. Claim 16**

Since claim 16 is dependent upon claim 1, Applicant submits that such claim is patentable at least by virtue of its dependency.

In addition, on pg. 2 of the Office Action, the Examiner maintains that, “by sending the broadcast packet to all domains simultaneously, Dinkin reads on the limitations of the claim.” However, Dinkin does not disclose that all broadcasts are sent simultaneously. In the February 26, 2004 Preliminary Response, Applicant assumed that the Examiner alleges that the first broadcast of Dinkin is sent to all domains at the same time. However, Applicant also indicated

that there is no specific disclosure in Dinkin to demonstrate such reasoning. Rather, as stated in col. 3, lines 31-32, Dinkin specifically discloses that broadcast requests are not sent to all sub-area domains at the same time.

Applicant respectfully requests the Examiner to specifically indicate where Dinkin discloses that all broadcast packets are sent simultaneously, if the rejection is to be maintained.

**G. Claim 17**

Since claim 17 is dependent upon claim 1, Applicant submits that such claim is patentable at least by virtue of its dependency.

**II. Rejection under 35 U.S.C. § 103(a) over Dinkin in view of U.S. Patent No. 5,754,790 to France et al. ("France").**

Claims 4 and 13 have been rejected under 37 C.F.R. § 103(a) as being unpatentable over Dinkin in view of France.

**A. Claim 4**

Applicant submits that claim 4 is patentable over the cited references. For example, claim 4 recites that a network number and an address of a router of each domain in a network, received from an RIP packet, are acquired.

The Examiner maintains that column 7, lines 4-12 of Dinkin disclose the above features. However, the cited portion of Dinkin just discloses that an Interface Node maintains a directory

of all network nodes in the PPN Network 102. As stated previously, the Examiner maintains that the PPN Network 102 discloses the claimed first domain. Accordingly, a directory of the network nodes in the alleged first domain fails to teach or suggest an address or network number of each domain or an address of each domain (i.e. a domain other than the alleged first domain). Since France fails to cure the deficient teachings of Dinkin, Applicant submits that claim 4 is patentable over the cited reference.

In regard to the Examiner's position of Official Notice, Applicant respectfully requests that the Examiner provide documentary evidence of such information in the next Office Action if the rejection is to be maintained (MPEP § 2144.03). Further, Applicant notes that a request was previously submitted in the January 27, 2004 Amendment.

**B. Claim 13**

Since claim 13 contains features that are analogous to the features recited in claim 4, Applicant submits that claim 13 is patentable for at least analogous reasons as presented above.

**III. Rejection under 35 U.S.C. § 103(a) over Dinkin in view of U.S. Patent No. 5,926,463 to Ahearn et al. ("Ahearn").**

Claim 14 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Dinkin in view of Ahearn. However, claim 14 contains features which are analogous to the features recited in claim 4 (i.e. instead of RIP, claim 14 utilizes SNMP). Therefore, Applicant submits

Amendment under 37 C.F.R. § 1.111  
U.S. Application No. 09/544,544

that claim 14 is patentable over the cited references for at least analogous reasons as presented above. In addition, Applicant again traverses the Official Notice rejection and requests that the Examiner provide documentary evidence of the information in the next Office Action if the rejection is to be maintained (MPEP § 2144.03).

#### IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

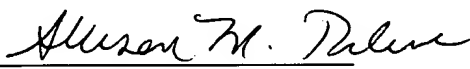
Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

  
Allison M. Tulino  
Registration No. 48,294

Date: July 2, 2004